

September 16, 2013

Ms. Rebecca Chu
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, AWT-121
Seattle, Washington 98101

BY E-MAIL ONLY

**RE: MONTHLY PROGRESS REPORT – AUGUST 2013
JORGENSEN FORGE EARLY ACTION AREA – REMOVAL ACTION
IMPLEMENTATION
U.S. EPA DOCKET NO. CERCLA-10-2013-0032
SEATTLE, WASHINGTON
FARALLON PN: 831-032**

Dear Ms. Chu:

Farallon Consulting, L.L.C. (Farallon) has prepared this monthly progress report on behalf of Earle M. Jorgensen Company (EMJ) to document the activities conducted during August 2013 at the Lower Duwamish Waterway Superfund Site Jorgensen Forge Early Action Area (Site) in Seattle, Washington. This monthly progress report was prepared in accordance with the requirements of the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action Implementation at the Site issued by the U.S. Environmental Protection Agency (EPA), Region 10, on November 5, 2012 under EPA Docket No. CERCLA-10-2013-0032. To date, approximately 20 percent of the required work activities are complete.

SCOPE OF WORK

This monthly progress report provides:

- A summary of field activities conducted during August 2013;
- Analytical results of samples collected during August 2013;
- A summary of deliverables submitted and received during August 2013;
- A summary of technical and regulatory meetings during August 2013;
- A summary of planned activities, meetings, and deliverables for September and October 2013; and
- A summary of deviations from the AOC schedule anticipated for September and October 2013.

FIELD ACTIVITIES – AUGUST 2013

No field activities were conducted during August 2013.



ANALYTICAL RESULTS – AUGUST 2013

No laboratory analytical results were received during August 2013.

DELIVERABLES – AUGUST 2013

The following deliverables were submitted in August 2013.

- July 2013 Monthly Progress Report was submitted to EPA on August 15, 2013; and
- Draft Removal Action Work Plan (RAWP) was submitted to EPA on August 22, 2013.

TECHNICAL AND REGULATORY MEETINGS – AUGUST 2013

In accordance with the Memorandum of Understanding between EMJ, Jorgensen Forge Corporation (Jorgensen Forge), and The Boeing Company (Boeing), the parties participated in coordination meetings on August 5, 8, 19, and 23, 2013 to continue coordination between the adjacent sediment cleanup designs and schedule.

A conference call was held between EPA, Farallon, and Anchor QEA on August 27, 2013 to discuss EPA comments on the draft RAWP. EPA provided written comments to EMJ on the draft RAWP on August 29, 2013.

PLANNED ACTIVITIES, MEETINGS, AND DELIVERABLES – SEPTEMBER AND OCTOBER 2013

Activities

No on-site activities are planned during September and October 2013.

Meetings

Project coordination meetings with Boeing are anticipated to occur bi-monthly during September and October 2013; and project coordination meetings with Boeing and EPA are anticipated to occur on September 30 and October 28, 2013.

Deliverables

The following deliverables will be provided to EPA during September and October 2013:

- Monthly Progress Report–August 2013 by September 15, 2013; and
- Final RAWP by October 1, 2013.

DEVIATIONS FROM AOC SCHEDULE – SEPTEMBER AND OCTOBER 2013

Several meetings were held with the Muckleshoot Tribe between July and September 2013. Agreement could not be reached between EMJ, Jorgensen Forge, and the Muckleshoot Tribe to facilitate completion of the removal action in 2013. Absent an agreement with the Muckleshoot Tribe, EPA is not willing to grant EMJ approval to proceed with the removal action in 2013. As a result of the EPA determination, the removal action will be postponed until August 2014. Farallon also understands that EPA will instruct EMJ to submit the RAWP per the Schedule of



Deliverables timeline identified in the Statement of Work. Future changes, if needed, to the RAWP would be captured as addenda or errata changes.

CLOSING

Farallon trusts that this monthly progress report provides sufficient information for EPA. If you have questions regarding this project, please contact the undersigned at (425) 295-0800.

Sincerely,

Farallon Consulting, L.L.C.

A handwritten signature in blue ink that reads "Amy Essig Desai".

Amy Essig Desai
Principal

cc: Mr. E. Gilbert Leon Jr., EMJ
Ms. Sheri Bozic, Jorgensen Forge Corporation
Messrs. William Joyce and Ian Sutton; Joyce Ziker Parkinson, PLLC
Messrs. Ryan Barth and David Templeton; Anchor QEA, LLC
Ms. Valerie Lee, Lee and Associates

AED:bw